

JUAN JOSE SALGUERO, et al., v.  
JVK OPERATIONS LIMITED  
Civil Action No.: 12-CV-0635

## **Exhibit B**

Declaration of Mark Patton in Support of Motion for Final Approval

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

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JUAN JOSE SALGUERO, OLVIN RAMON  
RODRIGUEZ, ALICIA RIVERIA GARCIA, THANIA  
VELASCO, CARLOS ROBERTO GARCIA, and  
YOVANY SIFORTES PINTO, on behalf of themselves  
and all others similarly situated,

Civil Action No.: 12-CV-0635  
(JFB)(AKT)

Plaintiffs,

-against-

JVK OPERATIONS LIMITED, VINOD SAMUEL,  
and MICHAEL CONNELL,

Defendants.  
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**DECLARATION OF MARK PATTON IN SUPPORT OF MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

I, Mark Patton, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am employed by Settlement Services, Inc. ("SSI") as the Senior Director of Operations. SSI has been retained as Claims Administrators in this action. SSI has been administering the settlement of large class actions since 1992.
2. As Senior Director of Operations for SSI, I have been responsible for, among other things, supervising the mailing of the notice of the settlement in this case, as required by the Court's March 31, 2015 Order.
3. On May 22, 2015, the Court-authorized Notice and Release Form ("Notice") were sent by first class-mail, postage prepaid, from SSI's office in Tallahassee, Florida, to the 826 persons who were provided to SSI as members of the settlement class conditionally certified by the Court on March 31, 2015. The notices included estimated award amounts for each Class Member, and notified each of their 30-day deadline to object or opt out, if they so chose.

4. As of July 20, 2015, 286 Notices were returned as undeliverable. After tracing the Class Members whose notices were returned, SSI was able to obtain possible new addresses for 53 of them and promptly mailed new Notices with updated response deadlines. Two-Hundred and eighteen traces were unsuccessful, yielding no additional class member location information. Fifteen were not traced because they were returned as undeliverable after the Notice Period.

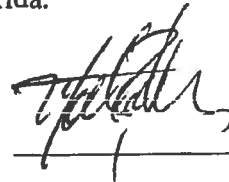
5. As of July 20, 2015, SSI has received 62 Consent Forms and 18 Worker Verification Forms. Additionally, SSI has received more Consent Forms, but were unable to confidently match the names to the class list. These additional notices have been sent to both parties to review and determine their eligibility.

6. No objections were filed in response to the Notice.

7. No requests for exclusion were filed in response to the Notice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of July, 2015, in Tallahassee, Florida.

A handwritten signature in black ink, appearing to read 'Mark Patton', is written over a horizontal line.

MARK PATTON